



Memorandum

To: John McGuiggin/Jim Christiansen

From: Shawn Oliveira

Date: January 27, 2005

Subject: BNSF Oversight Work Summary

A Summary of Site Work

As part of the ongoing removal activities for the Libby Asbestos Project, CDM Federal Programs Corporation (CDM) was tasked with providing technical support and limited oversight of the Burlington Northern and Santa Fe Railway Company (BNSF) rail yard contaminated ballast/soil removal. CDM's role was to provide general guidance and recommendations to ensure that removal activities were protective of public health, the environment, conducted in accordance with Environmental Protection Agency (EPA) approved guidance documents and that data collection was in accordance with the Final Draft Response Action Work Plan¹ (CDM RAWP (CDM November 2003)).

Environmental Management Resources, Inc. (EMR) and Kennedy/Jenks Consultants provided full-time design support, technical oversight, and air monitoring on behalf of BNSF during removal activities.

Summary of CDM Pre-Removal Activities

Pre-removal activities consisted of reviewing and providing comments on removal guidance documents, coordinating with EMR and Kennedy/Jenks Consultants to ensure that all soil and air samples were collected in accordance with current project requirements, participating in a Pre-bid meeting, Health and Safety (H&S) orientation presentation, and coordinating landfill operations to accommodate material removed from the BNSF rail yard.

A comprehensive review of BNSF removal guidance documents was performed to ensure that the Response Action Work Plan (RAWP), Burlington Northern Santa Fe Railroad Libby Rail Yard Asbestiform Fiber Removal, August 2004 (BNSF RAWP)² and BNSF Health & Safety Plan provided appropriate worker safety and public health protection. Several BNSF RAWP recommendations were made by Volpe National Transportation Systems Center

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(Volpe) and CDM. BNSF RAWP recommendations included modifications to backfilling procedures and rail tie washing operations. BNSF Health & Safety Plan recommendations included: defining required warning signage for the exclusion zone boundaries, and establishing perimeter air monitoring action levels and air sampling locations.

Additionally, the EPA required BNSF to develop a Quality Assurance Project Plan (QAPP). CDM provided a copy of the EPA approved QAPP within the CDM RAWP to EMR and Kennedy/Jenks. This QAPP was subsequently modified by EMR and Kennedy/Jenks for BNSF use.

Volpe and CDM also provided significant sample coordination support and training to EMR and Kennedy/Jenks during the pre-removal phase to ensure all data collection was designed and performed in accordance with Libby Asbestos Project data collection and documentation requirements stated in the RAWP. CDM provided specific training to EMR and Kennedy/Jenks sampling personnel with regard to completion of field sample data sheets, Chain of Custody (COC) forms, and sample collection procedures.

CDM Health & Safety participated in a pre-bid meeting that defined community expectations and project standards. Specific engineering controls and work practice requirements were discussed so contractors could accommodate these requirements in their bid.

CDM Health & Safety presented the Libby Asbestos Project Health & Safety Primer to the removal contractor workforce. The primer addressed the unique hazards and health effects of tremolite asbestos exposure, respiratory protection, personal protective equipment, engineering controls, and work practices.

Volpe and CDM coordinated with EPA, Montana Department of Environmental Quality, and BNSF to arrange for disposal of material generated from rail yard removal activities at the Lincoln County Asbestos Landfill. Modifications to landfill traffic patterns and material handling procedures were recommended by CDM Health & Safety to accommodate the estimated 15,000 cubic yards of removed material. CDM provided oversight and air monitoring in support of landfill dumping operations.

Summary of CDM Activities during Removal

Activities performed by CDM in support of the BNSF rail yard removal consisted of periodic inspections of removal activities, reviews of perimeter and personal air monitoring results, sample coordination, and community involvement.

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Periodic inspections of the BNSF rail yard removal activities were performed by CDM Health & Safety to ensure that engineering controls and work practices were implemented as specified in the BNSF Health & Safety plan. Inspections typically focused on dust control, haul truck and equipment decontamination, exclusion zone set-up, waste storage, rail tie washing operations, and traffic control.

Personal and perimeter air monitoring results were reviewed on a daily basis to ensure that project action levels were enforced. Perimeter air monitoring results exceeded project action levels one day during rail tie washing operations. In response, CDM Health & Safety inspected the rail tie washing operation and discussed engineering controls and potential improvements with BNSF, EMR, and Kennedy/Jenks personnel.

Sample coordination efforts consisted of daily quality control review of field sample data sheets, and coordinating with the onsite laboratory to facilitate timely analysis.

CDM Health & Safety provided community involvement support to the BNSF removal by actively communicating removal progress to members of the Libby Asbestos Technical Advisory Group (LATAG). A tour of the BNSF rail yard site was arranged for LATAG members to observe removal activities and discuss concerns with BNSF personnel.

Summary of CDM Activities Post-Removal

Volpe and CDM Health & Safety conducted a final project completion site walk with BNSF site representatives to inspect the restored rail yard areas. While conducting the final site walk, the Volpe representative observed a pile of Libby Vermiculite (LV) that was on existing rail yard property. A discussion was held with BNSF site representatives, and a decision was made to remove approximately 15 cubic yards of contaminated material. BNSF performed confirmatory soil sampling after the removal of the additional volume, CDM Health & Safety performed follow-up visual inspections of the removal area and subsequent restoration efforts.

References

1. Final Draft Response Action Work Plan for Libby Asbestos Project, Libby, Montana, November 2003.
2. Response Action Work Plan, Burlington Northern Santa Fe Railroad Libby Rail Yard Asbestiform Fiber Removal, August 2004.

cc: T. Wall
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